

1 ROB BONTA
Attorney General of California
2 ABIGAIL BLODGETT
Supervising Deputy Attorney General
3 STACY J. LAU (SBN 254507)
Deputy Attorney General
4 1515 Clay Street, 20th Floor
5 P.O. Box 70550
Oakland, CA 94612-0550
6 Telephone: (510) 879-1973
7 Fax: (510) 622-2270
E-mail: Stacy.Lau@doj.ca.gov

8 *Attorneys for Plaintiff State of California*

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 **STATE OF CALIFORNIA, STATE OF**
14 **NEW YORK, COMMONWEALTH OF**
15 **PENNSYLVANIA, STATE OF**
16 **COLORADO, STATE OF**
17 **CONNECTICUT, STATE OF**
18 **DELAWARE, STATE OF ILLINOIS,**
19 **STATE OF MAINE, STATE OF**
20 **MARYLAND, PEOPLE OF THE STATE**
21 **OF MICHIGAN, STATE OF NEW**
22 **JERSEY, STATE OF NEW MEXICO,**
23 **STATE OF NORTH CAROLINA, STATE**
24 **OF OREGON, STATE OF RHODE**
25 **ISLAND, STATE OF VERMONT, STATE**
26 **OF WASHINGTON, DISTRICT OF**
27 **COLUMBIA, CITY OF NEW YORK, and**
28 **the BAY AREA AIR QUALITY**
MANAGEMENT DISTRICT,

Plaintiffs,

v.

25 **UNITED STATES POSTAL SERVICE,**
26 **and LOUIS DEJOY, in his official capacity**
27 **as United States Postmaster General,**

Defendants.

Case Nos. 3:22-cv-02583-RFL
3:22-cv-02576-RFL

**DECLARATION OF STACY J. LAU IN
SUPPORT OF ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIALS
SHOULD BE SEALED**

**CLEANAIRNOW; CENTER FOR
BIOLOGICAL DIVERSITY; and SIERRA
CLUB,**

Plaintiffs,

v.

**LOUIS DEJOY, in his official capacity as
U.S. Postmaster General; and U.S. POSTAL
SERVICE,**

Defendants.

I, Stacy J. Lau, declare that:

1. I am a Deputy Attorney General representing Plaintiff State of California in this matter.
2. Defendants United States Postal Service and Louis DeJoy, in his official capacity as United States Postmaster General (“Defendants”) have marked portions of their administrative record as “Confidential” pursuant to the parties’ Stipulated Protective Order.
3. Plaintiffs’ Consolidated Motion for Summary Judgment cites or otherwise references administrative record material that Defendants have marked “Confidential” in the following locations:
 - Page 22, line 27 to page 23, line 1
 - Page 23, lines 11-14
 - Page 24, lines 8-10
 - Page 24, lines 14-15
 - Page 24, lines 17-23
 - Page 25, lines 9-12
 - Page 30, lines 4-6
 - Page 32, footnote 11, lines 1-3
 - Page 38, lines 28 to page 39, line 2

1 4. Concurrent with the filing of this declaration, Plaintiffs are conditionally filing a version
2 of their Consolidated Motion for Summary Judgment, with the above-referenced material
3 redacted.

4 5. Also concurrent with the filing of this declaration, Plaintiffs are filing an unredacted
5 version of their Consolidated Motion for Summary Judgment as an exhibit to Plaintiffs'
6 Administrative Motion to Consider Whether Another Party's Materials Should Be Sealed, with
7 the above-referenced material highlighted in blue.

8
9 I declare under penalty of perjury under the laws of the United States of America that the
10 foregoing is true and correct.

11
12
13 Dated: May 24, 2024

/s/ Stacy J. Lau
STACY J. LAU
Declarant